Comments of CBRS

SJP Network Solutions is a Wireless ISP that services the western tip of the Florida panhandle in areas where there was previously only one or two providers and no competition. We provide internet to single and multi-family homes, MDU/condominiums and small businesses. We deliver speeds from 8 Mbps up to 200 Mbps. Our customers prefer a local ISP over the big carriers because we can provide a better price point and locally based support.

Since the proposal of, we have been closely following the developments with the CBRS band because it solves big issues we have with both reliability and capacity with our current point-to-multipoint fixed wireless systems. The current 5GHz unlicensed band is becoming unreliable as more homes and businesses utilize high power Wi-Fi access points and is causing us to utilize different spectrums. We are currently purchasing a license for the 3650-3700 MHz band from a private party to start the transition to 3650-3700 MHz band. With favorable CBRS rules we will be able to scale to more rural areas that have no option for high speed internet as well as expand our current services to provide higher quality services with higher speeds in the range of 100-500 Mbps.

We do not agree with the proposals to increase the geographical size of PALs or PEAs or to lengthen the license terms to 10 years. These proposals cater to the national mobile carriers at the expense of smaller service providers. The CBRS band was developed with the intentions of innovation that would support a multitude of new methods and applications. It should not become just another band for the national mobile carriers to use for the development of '5G' networks. These proposals create economic barriers for small companies to afford bids on PALs and would allow the national mobile carriers to almost exclusively contain all the PALs. It is our belief that smaller companies will deploy the most innovative solutions, more quickly and cost-effective, that will benefit consumers in their markets using the CBRS band.

We believe the CBRS rules for PAL should remain as was originally designed using census tracts and should only have a 3 year term.

Warmest Regards, Spencer Pous, CEO SJP Network Solutions, LLC